

4. Defendants need the additional time to gather the necessary information from a third party in order to file a motion to compel arbitration and to stay these proceedings pending the completion of the arbitration.

5. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

6. On September 23, 2011, this Court entered an order providing that a proposed agreed scheduling order be filed (Doc. #21). If defendants file a motion to compel arbitration and stay proceedings and it is granted, there will be no need for the parties to submit an agreed scheduling order.

7. Clifford E. Yuknis discussed this matter with Courtroom Deputy Michael Dooley, who suggested the approach set forth in this motion. Opposing counsel Cassandra Miller informed Yuknis that she called Mr. Dooley on September 22, 2011 but he was not available.

WHEREFORE, Defendants MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC and ENCORE CAPITAL GROUP, INC. respectfully request that this Court grant it a 14-day enlargement of time up to and including October 17, 2011, to answer, move or otherwise plead to Plaintiff's Class Action Complaint and that the Court reset a date for the submission of an agreed scheduling order.

HINSHAW & CULBERTSON LLP

By: /s/ Clifford E. Yuknis

One of the Attorneys for Defendants
MIDLAND CREDIT MANAGEMENT,
INC., MIDLAND FUNDING, LLC and
ENCORE CAPITAL GROUP, INC.

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